

1        Dean Gazzo Roistacher LLP  
2        Lee H. Roistacher, Esq. (SBN 179619)  
3        440 Stevens Avenue, Suite 100  
4        Solana Beach, CA 92075  
5        Telephone: (858) 380-4683  
6        Facsimile: (858) 492-0486  
7        E-mail: [lroistacher@deangazzo.com](mailto:lroistacher@deangazzo.com)

5 Attorneys for Defendants  
6 State of California by and through California  
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

10 SANDRA KIRKMAN AND  
11 CARLOS ALANIZ,  
12 INDIVIDUALLY AND AS  
SUCCESSORS-IN-INTEREST TO  
JOHN ALANIZ, DECEASED,

13 Plaintiff,

14 ||

15 STATE OF CALIFORNIA;  
16 RAMON SILVA; AND DOES 1-10,  
INCLUSIVE,

17 || Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**DECLARATION OF SAMIR LYONS**

Courtroom: 8C  
Judge: Hon. Dolly M. Gee

FPTC Date: March 25, 2025  
Trial Date: April 15, 2025

19 I, Samir Lyons, declare:

20           1. I am over the age of 18 years and am an expert in the above-entitled  
21 matter.

22        2. I have personal knowledge of all of the matters stated herein and, if  
23 called as a witness, I could competently testify thereto, except as to those matters  
24 stated upon information and belief, and as to those matters, I believe them to be  
25 true.

26 | //

27 | //

1       3. The methods I use to create 3D animations for trial are based on my  
2 training, experience, and education as a professional 3D artist with over 20 years'  
3 experience creating animated videos for myriad industries, including forensics,  
4 feature films, television and advertisements. My direct experience creating  
5 animation in various fields has provided me with a vast knowledge of technical  
6 and artistic expertise and processes to ensure quality of work is high and the final  
7 output is technically accurate. All my past professional experiences allow me to  
8 bring my technical prowess into the courtroom, as well as to recruit, lead, manage,  
9 and supervise a team of highly skilled and competent creative and technical artists  
10 to deliver high-end legal animated exhibits for trial and mediation.

11       4. The methods utilized in this case to create demonstrative animations  
12 are commonly used and generally accepted within the discipline of forensic  
13 animation. Nothing in this demonstrative animation intends to manipulate any  
14 evidence. This process did not edit, corrupt, or otherwise destroy any of the  
15 underlying source data of the evidence.

16        5. I worked with Englert Forensics to prepare the animations and a  
17 collaboration with Rod Englert, Nikki Wagar, and Cheryl Kanzler from Englert  
18 Forensics was constant throughout this process. The animations were also  
19 reviewed and approved by Englert Forensics for accuracy and consistency of their  
20 opinions and analysis.

21 I declare under penalty of perjury under the laws of the United States of  
22 America that the foregoing is true and correct.

23 | Executed on March 20, 2025.

Samir Lyons  
Samir Lyons, declarant